

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

In re:

Brett Michael Harer  
**Debtor 1**

**Chapter 13**

**Case No.** 4:23-bk-01767-MJC

**Matter:** Motion for Termination of Wage  
Attachment Order

**MOTION FOR TERMINATION OF WAGE ATTACHMENT ORDER**

AND NOW, come the Debtor(s), Brett Michael Harer, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Motion for Termination of Wage Attachment Order and aver as follows:

- 1) Debtor(s) filed a Chapter 13 Petition on or about August 3, 2023.
- 2) Debtor 1 receives regular income from employment with United States Postal Service which has been attached under 11 U.S.C. §1326 to fund Debtor(s)' Chapter 13 Plan.
- 3) Debtor 1 wishes to terminate this wage attachment.

WHEREFORE, Debtor(s) respectfully requests that this Court enter an Order directing the above-mentioned employer to cease immediately this wage attachment to the Standing Chapter 13 Trustee.

Respectfully submitted,

Date: March 20, 2024

/s/ Brett Michael Harer

Debtor 1

**DETHLEFS PYKOSH & MURPHY**

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire  
PA ID No. 201207  
2132 Market Street  
Camp Hill, PA 17011  
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*Attorney for Debtor(s)*

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**ORDER OF COURT**

UPON CONSIDERATION of the above-referenced Debtor(s)' Motion for Termination of Wage Attachment Order, IT IS HEREBY ORDERED that until further Order of this Court, the entity from whom Debtor 1 receives income should immediately cease the wage attachment in the amount of **\$655.34** from each **bi-weekly** paycheck.

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**CERTIFICATE OF SERVICE**

I hereby certify that on Wednesday, March 20, 2024, I served a true and correct copy of the **Debtor(s)**'  
**Motion for Termination of Wage Attachment Order and proposed Order** in this proceeding upon the  
following:

Via USPS First Class Mail  
United States Postal Service  
Involuntary Deductions Unit  
2825 Lone Oak Parkway  
Saint Paul, MN 55121

Via Electronic Means  
Jack H. Zaharopoulos, Esquire  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

Office of the United States Trustee  
Sylvia H. Rambo US Courthouse  
1501 North Sixth Street, 3<sup>rd</sup> Floor  
Harrisburg, PA 17102

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.  
Paralegal for Paul D. Murphy-Ahles, Esquire